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13 Attorneys for Defendant
14 INDOCHINO APPAREL (US) INC.

15 UNITED STATES DISTRICT COURT
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17 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
18

19 REBECCA CASTILLO, an individual,
20
21 Plaintiff,
22
23 vs.
24 INDOCHINO APPAREL (US) INC., a
25 Delaware corporation; and DOES 1–10,
26 Inclusive,
27
28 Defendants.

CASE NO: 2:23-cv-07206 AB(CJx)

**DECLARATION OF ALEJANDRO
BUHLER IN SUPPORT OF
DEFENDANT INDOCHINO
APPAREL (US) INC.'S
OPPOSITION TO MOTION TO
REMAND**

I, Alejandro Buhler, declare and state as follows:

1. I am the Chief Technology Officer for Defendant Indochino Apparel (US) Inc. (Indochino), in the above-entitled action. This declaration is based upon my personal knowledge, except as to those matters stated on information and belief

1 and, as to those matters, I believe them to be true. If called upon as a witness, I could
2 and would competently testify as to the facts set forth therein.

3 2. As Chief Technology Officer for Indochino, I am responsible for
4 establishing the vision and strategy for Indochino's technology roadmap,
5 maintenance, upgrades and support for our systems including back end, retail, point
6 of sale, and ecommerce website; as well as responsible for cybersecurity, privacy and
7 compliance.

8 3. Indochino maintains a website that can be found at www.indochino.com.

9 4. Part of my responsibilities at Indochino include ensuring that the website
10 is accessible to Indochino customers and other seeking to access the information on
11 the website.

12 5. As part of Indochino's efforts to ensure its website is accessible,
13 Indochino implements the Word Wide Web Consortium's Web Content Accessibility
14 Guidelines (WCAG) 2.1 Level AA as its web accessibility standard.

15 6. The WCAG provide standards and different success criteria for websites
16 to follow in order to ensure the website is accessible to individuals with disabilities,
17 including visual impairment disabilities.

18 7. To comply with the WCAG standards and make the website accessible
19 to individuals with visual disabilities, Indochino will incur in excess of \$15,000 on an
20 annual basis for software that provides individuals with visual disabilities with access
21 to information on Indochino's website.

22 8. In addition to the software costs, Indochino will incur in excess of
23 \$25,000 in annual costs for labor, web developers, quality assurance, and ecommerce
24 teams to ensure that Indochino's website is compliant with the WCAG standards and
25 accessible by individuals with disabilities.

26 9. In 2022, for example, the total cost of labor and software necessary to
27 keep Indochino's website compliant with the WCAG standards and accessible by
28

1 individuals with disabilities exceeded \$41,000.

2 10. I expect the costs to keep Indochino's website compliant with the WCAG
3 standards and accessible by individuals with disabilities for 2023 and the years that
4 follow to be similar (and likely greater given advances in technology, inflationary
5 pressures, and related circumstances).

6 I declare under penalty of perjury under the laws of the United States of
7 America that the foregoing is true and correct. Executed on this 13th day of October,
8 2023.

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12 Alejandro Buhler
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